

Matthew I. Knepper, Esq.  
Nevada Bar No. 12796  
Miles N. Clark, Esq.  
Nevada Bar No. 13848  
KNEPPER & CLARK LLC  
10040 W. Cheyenne Ave., Suite 170-109  
Las Vegas, NV 89129  
Phone: (702) 825-6060  
Fax: (702) 447-8048  
Email: matthew.knepper@knepperclark.com  
Email: miles.clark@knepperclark.com

David H. Krieger, Esq.  
Nevada Bar No. 9086  
HAINES & KRIEGER, LLC  
8985 S. Eastern Ave., Suite 350  
Henderson, NV 89123  
Phone: (702) 880-5554  
Fax: (702) 385-5518  
Email: dkrieger@hainesandkrieger.com

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

KATHLEEN C. DEY,  
Plaintiff,

vs.

EXPERIAN INFORMATION SOLUTIONS,  
INC; DITECH FINANCIAL, LLC; and  
TRANS UNION LLC,  
Defendant.

Case No.: 2:18-cv-00503-APG-NJK

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
RESPOND TO MOTION TO DISMISS**

**[SECOND REQUEST]**

Plaintiff Kathleen C. Dey (“Plaintiff”), by and through his counsel of record, and Trans Union LLC (“Trans Union”) have agreed and stipulated to the following:

1. On March 19, 2018, Plaintiff filed a Complaint [ECF Dkt. 1].

STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO MOTION TO DISMISS  
[SECOND REQUEST] - 1

1           2.     On May 11, 2018, Trans Union filed a Motion to Dismiss the Complaint [ECF Dkt.  
2 13].

3           3.     On May 25, 2018, Plaintiff filed an Amended Complaint [ECF Dkt. 19].

4           4.     On May 29, 2018, the Court denied Trans Union's Motion to Dismiss Complaint.


5           5.     On June 4, 2018 Trans Union filed a Motion to Dismiss the Amended Complaint  
6 [ECF Dkt. 25].

7           6.     On June 18, 2018, the Court granted the parties' first stipulation for extension of  
8 time. ECF Dkt. 24.

9           7.     Plaintiff's Response is due July 9, 2018.

10           8.     Plaintiff and Trans Union have agreed to extend Plaintiff's response an additional  
11 fourteen days in order to allow the parties to further discuss possible resolution of this matter.  
12 Given the intervening Fourth of July holiday, it may not be possible to conclude negotiations prior  
13 to the time the response is due on July 9. As a result, both Plaintiff and Trans Union hereby request  
14 this Court to further extend the date for Plaintiff to respond to Trans Union's Motion to Dismiss  
15 Complaint until **July 23, 2018**. This is the second request for seeking an extension, and  
16  
17  
18

19           **IT IS SO ORDERED.**

20  
21   
22 \_\_\_\_\_  
23 UNITED STATES DISTRICT JUDGE  
24 Dated: July 3, 2018.

is not made for purposes of delay.

**IT IS SO STIPULATED.**

July 3, 2018.

**KNEPPER & CLARK LLC**

/s/ Miles N. Clark

Matthew I. Knepper, Esq.  
Nevada Bar No. 12796  
Miles N. Clark, Esq.  
Nevada Bar No. 13848  
10040 W. Cheyenne Ave., Suite 170-109  
Las Vegas, NV 89129  
matthew.knepper@knepperclark.com  
miles.clark@knepperclark.com

David H. Krieger, Esq.  
Nevada Bar No. 9086  
HAINES & KRIEGER, LLC  
8985 S. Eastern Avenue, Suite 350  
Henderson, NV 89123  
dkrieger@hainesandkrieger.com  
*Counsel for Plaintiff*

**NAYLOR & BRASTER**

/s/ Andrew J. Sharples

Jennifer L. Braster, Esq.  
Nevada Bar No. 9982  
Andrew J. Sharples, Esq.  
Nevada Bar No. 12866  
1050 Indigo Drive, Suite 200  
Las Vegas, NV 89145  
Email: jbraster@nblawnv.com  
Email: assharples@nblawnv.com  
*Counsel for Defendant*  
*Experian Information Solutions, Inc.*

**LEWIS BRISBOIS BISGAARD & SMITH**

/s/ Jason Revzin

Jason Revzin, Esq.  
Nevada Bar No.  
6385 S. Rainbow Blvd., Suite 600  
Las Vegas, NV 89118  
Email: jason.revzin@lewisbrisbois.com  
*Counsel for Defendant Trans Union LLC*

**WOLFE & WYMAN LLP**

/s/ Andrew S. Bao

Andrew A. Bao, Esq.  
Nevada Bar No. 10508  
6757 Spencer Street  
Las Vegas, NV 89119  
Email: aabao@wolfewyman.com  
*Counsel for Defendant Ditech Financial, LLC*

**ORDER**

**IT IS SO ORDERED.**

UNITED STATES DISTRICT JUDGE

Dated: \_\_\_\_\_

STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO MOTION TO DISMISS  
[SECOND REQUEST] - 3